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OFFICE OF THE
EXECUTIVE SECRETARY

August 24, 2000

Mr. Donald I. Marshall
Assistant Vice President – Regulatory Affairs
201 E. 4th Street, Room 102-910
Cincinnati, OH 45202

RE: Broadwing Local Services, Inc. (Docket No. 00-00710)

Dear Mr. Marshall:

The Tennessee Regulatory Authority requests the following information regarding the Application of Broadwing Local Services, Inc. (BLSI) for a Certificate of Public Convenience and Necessity to provide competing local telecommunications services in the state of Tennessee:

TRA Rules for Local Telecommunications Providers:

The Applicant should serve notice of its application on the eighteen (18) Incumbent Local Exchange Carriers (ILECs) in Tennessee with a statement regarding the company's intention of operating geographically. Please provide a list of the ILECs on whom the Company served notice of its application.

Financial Requirements:

On March 10, 2000, the Tennessee General Assembly enacted Public Chapter 586, which amends the Tennessee Code Annotated, §65-5-125. This amendment states that by September 1, 2000, all telecommunications service providers subject to the control and jurisdiction of the authority, except those owners or operators of public telephone service who pay annual inspection and supervision fees pursuant to Tennessee Code Annotated, §65-4-301(b), or any telecommunications service provider that owns and operates equipment facilities in Tennessee with a value of more than five million (\$5,000,000), shall file with the authority a corporate surety bond or irrevocable letter of credit in the amount of twenty thousand dollars (\$20,000) to secure the payment of any monetary sanction imposed in any enforcement proceeding, brought under this title or the Consumer Telemarketing Protection Act of 1990, by or on behalf of the Authority. **Provide a statement outlining the Applicant's intent to abide by TCA §65-4-125 and provide a corporate surety bond by September 1, 2000 if applicable.**

Attached for your convenience are samples that you may use to comply with this requirement.

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Please provide the following financial information:

1. Three-year projected financial statements prepared according to GAAP (Balance Sheet, Income Statement, and Statement of Cash Flows).
2. Three year capital expenditures budget which includes equipment to be deployed; cost of equipment and sources of funding the Tennessee network, equipment, and UNEs: cash, loan commitments, vendor credits, letters of credit, etc. (complete detail).
3. Please quantify amounts, if any, included in financial statements and projections relating to reciprocal compensation for terminating ISP traffic.

Services to be Provided:

Will BLSI provide the following services?

1. White pages directory listing
2. Free blocking for 900/976
3. Access to telecommunications relay service
4. Educational discounts existing on June 5, 1995

Toll Dialing Parity Plan for Applicants Providing Voice Grade Service:

Include statements concerning nondiscriminatory access to telephone numbers, operator services, directory services, directory assistance and directory listings.

Technical Requirements:

Provide the following technical information:

1. Location of switches, i.e. cities.
2. Method of deployment
3. Type of equipment, e.g. DMS-100, 5ESS, Fiber Rings
4. State if there are any special Customer Premise Equipment (CPE) requirements that would not be compatible with the network of the incumbent carrier.

Tennessee Specific Operational Issues

Please provide answers to the following questions concerning Tennessee Specific Operational Issues.

1. How does the company intend to comply with TCA §65-21-114? In its description, please explain technically how the company will not bill for countywide calls within Tennessee.
2. Is the company aware of the Tennessee County-Wide Calling database maintained by BellSouth and the procedures to enter your telephone numbers on the database?
3. Is your company aware of the local calling areas provided by the Incumbent Local Exchange Carriers in your proposed service areas?
4. Explain the procedures that will be implemented to assure that your customers will not be billed long distance charges for calls within the metro calling areas.
5. Mr. Marshall's direct testimony named Ms. Judy Piepmeier as BLSI's contact to resolve customer complaints. Please provide her telephone number.
6. Does the company intend to telemarket its services in Tennessee? If yes, is the company aware of the telemarketing statutes and regulations found in TCA §65-4-401 *et seq.* and Chapter 1220-4-11?

Numbering Issues:

1. The Dialing Parity Plan ("Exhibit 7" of the Application) referred to an "Exhibit A" that was to list the exchanges and schedule by which BLSI intends to implement its services in Tennessee. This Exhibit was missing from the application. Please provide a copy of "Exhibit A."
2. In which NPA does BLSI intend to establish its footprint?
3. How many NXXs will BLSI require?
 - Within one year of the approval of the Application?
 - When BLSI establishes its service footprint?
4. Will BLSI assign numbers sequentially within NXXs?
5. How does BLSI intend to conserve TN numbering resources?
6. When ordering new NXXs for growth, what percentage fill of an existing NXX does BLSI use to determine when to initiate a request for a new NXX?

Miscellaneous Requirements:

Please provide the following miscellaneous requirements:

1. Are customer deposits required? If so, what amount is required? Is the applicant bonded for the amount of the deposits?
2. A tariff should be filed subsequent to application's approval and before commencing operations (tariffs filed with application are informational only, not official filings)

Please submit the requested information by September 8, 2000. If you have any questions, please contact Arnold Reed at (615) 741-2904 (ext. 207).

Sincerely,

David Waddell
Executive Secretary

Attachment (1)

C: Docket File
Joe Werner
Darlene Standley
Carsie Mundy